

EXHIBIT 10

1 IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

MDL No. 2804

2 Case No. 17-md-2804

3 THIS RELATES TO:

4
5 CITY OF CLEVELAND, OHIO, ETAL VS. PURDUE PHARMA L.P.

6 ET AL CASE NO. 18-OP-45132

7
8 THE COUNTY OF CUYAHOGA, OHIO, ET AL VS. PURDUE

9 PHARMA L.P., ET AL CASE NO. 18-OP-45090

10
11 THE COUNTY OF SUMMIT, OHIO, ET AL VS. PURDUE PHARMA

12 L.P., ET AL CASE NO. 17-OP-45004

13
14
15 VIDEO DEPOSITION OF

16
17 MAGGIE KEENAN

18
19
20 JANUARY 18, 2019

21
22 DEPOSITION HELD AT CLIMACO, WLICOX, PECA & GAROFOLI

23 55 PUBLIC SQUARE

24
25 CLEVELAND, OH 44113

<p style="text-align: right;">Page 130</p> <p>1 back on the record.</p> <p>2 Q (Mr. Keyes) Miss Keenan, turning your</p> <p>3 attention to the prosecutor line on this chart.</p> <p>4 A Yes.</p> <p>5 Q Do you how any of the figures for that</p> <p>6 line were calculated?</p> <p>7 A Um, no, I do not. I was not part of the</p> <p>8 calculation. That was done by the attorneys.</p> <p>9 Q This refers to prosecutors who prosecute</p> <p>10 criminal cases, correct?</p> <p>11 A Again, I wasn't part of it, but I do not</p> <p>12 believe that that would be exclusive to criminals or</p> <p>13 prosecutors who prosecute criminal defendants.</p> <p>14 Q You said there are prosecutors who</p> <p>15 prosecute criminal cases and prosecutors who are</p> <p>16 involved in trying to remove children from their</p> <p>17 homes?</p> <p>18 A That's correct. And we have prosecutors</p> <p>19 who are involved in tax foreclosures.</p> <p>20 Q Is the time spent by prosecutors on</p> <p>21 prosecuting tax foreclosures included in that line</p> <p>22 item?</p> <p>23 A That I can't answer.</p> <p>24 Q Is the time a prosecutor spent prosecuting</p> <p>25 criminal case included in this line?</p>	<p style="text-align: right;">Page 132</p> <p>1 A Yes. They are also involved in cases of</p> <p>2 child support, and they also, the prosecutor's</p> <p>3 office has a civil division. So that's the civil</p> <p>4 attorneys represent the county.</p> <p>5 Q And given the prosecutors fulfill those</p> <p>6 different functions, what are the specific harms</p> <p>7 incurred by Cuyahoga County because of the opioid</p> <p>8 problem related to prosecutors?</p> <p>9 A That's identified in this table.</p> <p>10 So, for example, in 2017, the harm to</p> <p>11 the county prosecutor's office was \$5 million.</p> <p>12 Q Okay. But, ma'am, you keep switching back</p> <p>13 and forth between the chart. When I ask you a</p> <p>14 question about the chart, you say I wasn't involved</p> <p>15 in the chart, I don't know how the numbers are</p> <p>16 prepared.</p> <p>17 So I'm not asking you to look at the</p> <p>18 chart. I'm saying as the corporate representative</p> <p>19 on the damages topic, where I ask you to tell me</p> <p>20 what the damages are. You went through a list and</p> <p>21 one of the items on your list was prosecutors. So</p> <p>22 I'm asking you with respect to prosecutors, what are</p> <p>23 the harms incurred by Cuyahoga County relating to</p> <p>24 the opioid epidemic, tell me what they are?</p> <p>25 MR. BADALA: Objection, asked and answered</p>
<p style="text-align: right;">Page 131</p> <p>1 MR. BADALA: Are you done with that</p> <p>2 answer?</p> <p>3 A No. I can't answer that. I was not part</p> <p>4 of this calculation, this was done by the experts.</p> <p>5 Q (Mr. Keyes) Okay. The prosecutors you</p> <p>6 said though line item includes the personnel cost of</p> <p>7 prosecutors, correct?</p> <p>8 A I can definitively would say this include</p> <p>9 some personnel cost, yes.</p> <p>10 Q The prosecutors you described three</p> <p>11 things, they prosecute criminal cases, correct?</p> <p>12 A That's correct.</p> <p>13 Q Where the defendants have been accused of</p> <p>14 a crime?</p> <p>15 A That is correct.</p> <p>16 Q They prosecute tax foreclosure cases,</p> <p>17 correct?</p> <p>18 A That is correct.</p> <p>19 Q Do the tax foreclosure cases have anything</p> <p>20 to do with prescription opioids?</p> <p>21 A They might.</p> <p>22 Q Do you know?</p> <p>23 A I do not know for sure, no.</p> <p>24 Q And you said the prosecutors are involved</p> <p>25 in cases to remove children from their homes?</p>	<p style="text-align: right;">Page 133</p> <p>1 just for the record, she was going through the chart</p> <p>2 and saying she made a list.</p> <p>3 A This exhibit identifies the county damages</p> <p>4 for the prosecutor's office, for the period 2006</p> <p>5 through 2017. We have identified \$50 million that</p> <p>6 is the harm that has been caused to the prosecutor's</p> <p>7 office.</p> <p>8 Q (Mr. Keyes) What does that \$50 million</p> <p>9 measure, what is it?</p> <p>10 MR. BADALA: Objection to form.</p> <p>11 Q (Mr. Keyes) What are the components of</p> <p>12 the costs that are included in that \$50 million?</p> <p>13 MR. BADALA: Objection to form, asked and</p> <p>14 answered.</p> <p>15 A I have answered that. This table was</p> <p>16 created by experts. This is not in the county's,</p> <p>17 this is outside the scope of what my role is as a</p> <p>18 budget director, I'm sorry to cover that, and what</p> <p>19 the county does. We rely on experts.</p> <p>20 Q (Mr. Keyes) Okay. Put the chart to the</p> <p>21 side. We don't need to look at the chart since you</p> <p>22 know nothing about the chart. So you can put the</p> <p>23 chart to the side.</p> <p>24 A But my topic is damages. If we are still</p> <p>25 talking about damages, I'm going to refer to this</p>